A. Cost Study Adjustments

Issue A-1. Staff notes in the Shared and Common cost study that Ameritech inserted a change to the denominator for network support, between the number shown on page 4 and the number shown on page 3. By lowering the denominator, it had the effect of increasing the shared and common mark-up. Upon further inquiry, Ameritech explained that the change was made to reflect the Commission's TELRIC adjustments. Staff had Ameritech submit its supporting calculations for this TELRIC adjustment which were not included in the shared and common cost study in the compliance filing. The fill factor has particular importance. Staff inquired why Ameritech made this adjustment to the shared and common cost study, when the originally filed cost study did not include an input for the fill factor. The shared and common cost study is an accounting based model and computes forward-looking costs by adjusting accounting embedded costs to current costs. Accordingly, it has no input for a fill factor. Effectively, the shared and common cost study is based on Ameritech's actual levels of fill. While the Commission did not use Ameritech's actual fill factors in the unbundled loop cost studies, it did rely on Ameritech's explanation that adding spare capacity has very little incremental impact on costs in its day-to-day operations. Ameritech, on the record or in briefs, did not assert that a change in the fill factor would need to be carried through to the shared and common cost study or describe any method by which such an adjustment could be made.

Data Request A-1: Please remove Ameritech's adjustment to the denominator for network support in the shared and common cost study.

Ameritech's Response: Attachment A: Wisconsin UNE with order changes A-1 A-2 A-3 has been submitted incorporating the changes of this request to the Shared & Common factor. Refer to the file for the new factor.

The shared and common cost study originally submitted by Ameritech in this proceeding was based on the same fill factor assumptions as Ameritech's TELRIC studies: actual fill levels. Therefore, it is not correct to say that Ameritech's shared and common cost study "has no input for a fill factor." Moreover, the fill factor assumptions in the shared and common cost study and in the TELRIC studies were linked – as they clearly should be. It is illogical, unfair and improperly results-driven to have different investment assumptions determine TELRIC rates, on the one hand, and the shared and common cost denominator, on the other. The two measure the same thing: Ameritech's direct investment in its network facilities that may be leased by its competitors. Therefore, they should be the same. Were Ameritech Wisconsin to maintain actual fill levels in the shared and common cost study, and at the same time use the much higher fills ordered by the Commission in calculating the TELRICs the competitors will actually pay, Ameritech Wisconsin would be forced in effect to maintain two sets of TELRIC books: one set of low investment numbers that yield low TELRIC rates for competitors; and one set of high investment numbers used to drive down the shared and common costs these same competitors are required to pay. Two sets of books, with significantly different numbers, is no more proper – or lawful – here than it would be in the case of the accounting ledgers of a public company. Shared and common costs must be based on the same direct investment numbers used to determine TELRIC rates. And the only way to ensure that that happens is to maintain the link between fills used in the shared and common cost study and those used in the TELRIC studies – which is precisely what Ameritech has done in its compliance filing.

The statement that the Commission "did rely on Ameritech's explanation that adding spare capacity has very little incremental impact on costs in its [Ameritech's] day-to-day operations" in deciding not to "use Ameritech's actual fill factors in the unbundled loop cost studies" is puzzling. Ameritech made clear, both in Richard Mullin's testimony and in its post-hearing briefs, that the costs associated with having too little spare, i.e., operating a network consistent with the fills advocated by the CLECs and ultimately adopted by the Commission, were enormous. Specifically, Ameritech explained that by forcing it to operate a network with the minimal spare capacity associated with those CLEC-advocated fills would boost its outside plant installation costs as much as fifty fold.

Issue A-2: On page three of the shared and common cost study, Ameritech made an adjustment to the dollar amount for Total Corporate Overhead. The dollar amount for Total Corporate Overhead increased by approximately $12 million over the amount in Ameritech's June 2000 original filing of its shared and common cost study. Upon further inquiry by staff, Ameritech explained that the change was made to add OSS testing costs. Staff had Ameritech submit its supporting calculations for the OSS testing costs which were not included with the compliance filing in the shared and common cost study. Staff inquired where in the Final Decision Ameritech found that the Commission instructed this adjustment to be made. Ameritech explained that it believed that the order in docket 6720-TI-160 provided for this adjustment. As this is the compliance phase of the 6720-TI-161 docket and not the 6720-TI-160 docket, it is questionable whether the inclusion of these costs should be allowed in this filing.

Data Request A-2: Please remove this adjustment to Total Corporate Overhead from the 6720-TI-161 compliance filing.

Ameritech's Response: Attachment A: Wisconsin UNE with order changes A-1 A-2 A-3 has been submitted incorporating the changes of this request to the Shared & Common factor. Refer to the file for the new factor.

In its Final Decision, the Commission determined that the costs incurred to make UNEs available (i.e., wholesale product support costs) should be labeled "competition implementation costs" and placed in the "Network Support" category of Ameritech's shared and common cost model – effectively (and we believe erroneously) making these UNE-specific costs common rather than joint costs. The Commission, however, was quite clear that these costs should be part of the shared and common cost numerator and, as such, recovered in the shared and common cost markup. OSS testing expenses are obviously costs incurred to make UNEs available; in addition, they have been (and will be) incurred at the CLECs' insistence; and, like the product support costs at issue in the hearing phase of this proceeding, they are incurred to implement the opening of the local exchange market to competition. Accordingly, consistent with the Commission's Final Decision, Ameritech must be permitted to recover these OSS testing costs, which are booked to account 6728 (an explicit component of the shared and common cost numerator approved by the Commission) via inclusion in the "Network Support" category.

Issue A-3. On page 12 of the shared and common cost study, Ameritech adjusted the forecast of plant index levels presumably to reflect the Commission's requirement to make the CLECs' adjustment for investment growth. By making the adjustment in that location, the change to investment was only applied to the incremental cost increases from 1998 to 2001. Alternatively, had Ameritech made the required adjustment to the Adjusted Study Year Investment on page 5, the required adjustment to investment would apply to the full investment and not just the incremental price increases.

Data Request A-3: Please remove Ameritech's adjustment to the forecast of plant index levels and insert the Commission's investment growth adjustment to the Adjusted Study Year Investments.

Ameritech's Response: Attachment A: Wisconsin UNE with order changes A-1 A-2 A-3 has been submitted incorporating the changes of this request to the Shared & Common factor. Refer to the file for the new factor.

Ameritech Wisconsin applied the Commission-ordered investment growth adjustment factors to *total* base year (1998) investment – and not to only "incremental cost increases from 1998 to 2001." Ameritech Wisconsin read the *Final Decision* as rejecting Ameritech Wisconsin's proposed TPI adjustments. Accordingly, Ameritech Wisconsin substituted (1 minus .045) for the land and support TPI ratio for Land and Building, and substituted (1 plus .1231) for the TPI ratios for all other accounts. Were Ameritech Wisconsin to aggregate the two sets of adjustments, i.e., apply both the TPI adjustments and the CLEC-suggested investment growth adjustments, which is what Staff appears to be suggesting, the result would be a "mixed bag." That is, total investment would increase slightly in some cases (e.g., cable), but would decline materially in others (e.g., switching).

Issue A-4: In order to review the maintenance factor, staff requested the supporting workpapers to the calculation of the annual cost factors. Ameritech provided a document titled, Detailed Annual Charge Factors. In reviewing that document, staff notes that Ameritech made an adjustment to decrease the maintenance factor by 3 percent. Staff explained that it was looking for a productivity adjustment of 8.7 percent after 3 years. By applying a 3 percent productivity adjustment each year for three years, the initial base year would be reduced by approximately 8.7% (1-(.97)*(.97)*(.97)). Ameritech explained that it interpreted the Final Decision to require the entire productivity adjustment to be 3 percent.

Data Request A-4: Please remove Ameritech's 3 percent decrease to the maintenance factor and insert an 8.7 percent decrease to the maintenance factor.

Ameritech's Response:

Attachment B: ACF summary sheet with changes_09-06-02 with % change FAO has been submitted incorporating the above requested changes to the maintenance factor. Refer to the file for the new maintenance factor.

The following attachments are included as supporting documentation:

Attachment C: LatestACAR 03_22_02 with WI UNE figures_FAO
Attachment D: LatestACAR 09_06_02 with WI UNE & ordered mtce factors_FAO
Attachment E: LatestACAR 09_06_02 with WI UNE & ordered mtce factors+dep lives_FAO
Attachment F: LatestACAR 09_06_02 with WI UNE & ordered mtce factors+dep lives+COC_FAO

Issue A-5: Also in reviewing the maintenance factor, staff inquired where Ameritech inserted the Commission's requirement to make the CLECs' adjustment which removes maintenance expenses in proportion to the amount of plant that is fully depreciated. Ameritech explained that this adjustment resulted in no change to the maintenance factor. Ameritech explained that it removed both plant investment associated with fully depreciated plant and expenses associated with fully depreciated plant so the net effect was no change to the maintenance factor. That conclusion is not consistent with the CLEC witness's testimony and Ameritech was required to make the CLECs' adjustment. Please refer to witness Brad Behounek's testimony at transcript page 2874. The percentages to use for each account are shown in a table on transcript page 2872. These should reduce the maintenance factor by up to 50 percent depending on the applicable plant account. For example, if the maintenance factor was 10 percent and 25 percent of the plant was fully depreciated, then the Commission required Ameritech to reduce the maintenance factor by 25 percent to 7.5 percent.

Data Request: A-5: Please use the table on transcript page 2872 that identifies the proportion of fully depreciated plant and reduce the maintenance factor using the calculation as described above.

Ameritech's Response: Attachment B: ACF summary sheet with changes_09-06-02 with % change FAO has been submitted incorporating the reduction of the proportion of fully depreciated plant from the maintenance factor. Refer to the file for the new maintenance factor.

Attachment C: LatestACAR 03_22_02 with WI UNE figures_FAO
Attachment D: LatestACAR 09_06_02 with WI UNE & ordered mtce factors_FAO
Attachment E: LatestACAR 09_06_02 with WI UNE & ordered mtce factors+dep lives_FAO
Attachment F: LatestACAR 09_06_02 with WI UNE & ordered mtce factors+dep lives+COC_FAO
Attachment G: Digital Switching Maintenance calculations 09_06_02_FAO

Issue A-6: Staff was unable to find any historical cost information upon which to base an average IDLC conversion cost. Also, Staff did not find the addition of 1 percent of the monthly recurring cost of IDLC conversions to the final loop rates. When asked, Ameritech explained that it had missed this adjustment and was preparing a correction.

Data Request A-6: Please file the required cost information and explain why this information was not included in its compliance filing.

Ameritech's Response: AIT inadvertently missed the requirement to develop a monthly recurring charge for IDLC Conversions to be added to the cost of all unbundled loops. AIT has since performed a cost study based on the commission provided direction in the Final Decision.

Reference: Attachment H: IDLC Conversion_R_Whsl_WI_02-05_COMP_Sept 2002.xls

Issue A-7: Staff expected to see two versions of line connection charge cost studies; one that reflected the 2 percent manual central office cross connects and another that reflected 100 percent manual central office cross connects, as the Commission broke this charge into two charges with one applicable to stand alone unbundled loops and one applicable to loops in combination. The 100 percent manual cross connects cost studies would then be applicable to the line connection charges for stand alone unbundled loops. The 2 percent manual central office cross connects cost study would be applicable to loops in combination. However, Ameritech developed a new type of rate called a loop provisioning charge and filed a new loop provisioning cost study. The Final Decision did not identify any need for a new cost study. On the record Ameritech stated that its original June 2000 line connection charge were already based on 100 percent manual cross connects.

Data Request A-7: Please re-file Ameritech's original June 2000 line connection cost studies, including its original 100 percent manual central office cross connects assumptions, however updated only for all other adjustments included in the Final Decision.

Ameritech's Response: AIT has revised the June 2000 DS0 & DS1 Loop NRC study and June 2000 DS3 Loop NRC study for the commission ordered adjustments contained in the Final Decision.

Reference: Attachment I: WI UNE NRC Digital Loop DS0 DS1 2001_COMP_Sept 2002.xls
Attachment J: Wi_une_2_6720-TI-161_COMP_Sept 2002.xls

B. Additional Questions

Issue B-1: Ameritech created a new cost study for manual service ordering.

Data Request B-1: Please explain where in the Final Decision Ameritech believes that it was instructed to file a new cost study for manual service ordering.

Ameritech's Response: Ameritech-Wisconsin provided the "Manual Service Order UNE-P POTS" cost study (file name: RJF-4 - May 2002 compliance) in response to the Final Decision. On page 186, "the Commission further finds that Ameritech should create a different NRC for the UNE-P than stand alone unbundled loops. In addition, the Commission also finds that Ameritech should create separate NRCs for migrations and new installations." Also, on page 175, the Commission "finds it reasonable to apply the same 2 percent fall-out rates for the initial receipt of orders for DS0 loops in the UNE-P and DS0 loops not in combination." This made it necessary to modify the original manual UNE-P study to apply the 2% fallout. The study initially appeared as Exhibit RJF-4 to the Rebuttal Testimony of Ameritech-Wisconsin witness Richard J. Florence. This Exhibit was renamed Exhibit 42c when entered into testimony.

Issue B-2: The Final Decision requires Ameritech to "use a separate rate for migrations versus initial installations." (p. 179) In addition the Final Decision requires that disconnection costs should be collected at the time of disconnection. (p. 183) Staff sees separate rates for Install Charge and Disconnect Charge on many different types of UNEs. However, the only UNE that includes the specific identification of a migration is the rate for UNE-P migration.

Data Request B-2: Why didn't Ameritech create separate rates for migrations and separate rates for initial installations for unbundled loops, unbundled ports, broadband UNE, unbundled transport, etc.? In other words, why didn't Ameritech create a Migration Charge everywhere that Ameritech has an Install Charge and a Disconnect Charge?

Ameritech's Response: Ameritech-Wisconsin provided costs for UNE-P migrations both with & without dial tone and electronic & manual. With regard to individual UNEs, like unbundled loops, there are no migrations. As a result, Ameritech-Wisconsin did not provide any migration costs for individual UNEs. "Migration" refers to a change of the label attached to an existing combination of UNEs used to provide an end-to-end service. For example, existing retail or resale service can be "migrated" to service via the UNE platform without changing or severing any of the existing facilities and connections used to provide the service. By definition, provisioning a standalone UNE, such as an unbundled loop, a standalone unbundled switch port, or unbundled dedicated transport, cannot involve a "migration." First, a standalone UNE does not provide an end-to-end service; it must first be combined with, or connected to, other facilities. Second, provisioning a standalone UNE requires physical work, most frequently in the central office. For example, provisioning a standalone unbundled loop requires disconnecting the loop from the switch port, and running a jumper from the loop's connection at the MDF to the requesting carrier's collocation space. Stated differently, provisioning a standalone UNE is always an "initial installation"; it can never be a "migration."

Issue B-3: On Part 19, Section 3, sheet 31 Ameritech has the description of the ULS Usage Establishment Charge, but also explains, "Pursuant to the direction of the Public Service Commission of Wisconsin in its Finding of Fact, Conclusion of Law and Second Order in Docket 6720-TI-120, Ameritech will not recover the ULS Usage establishment costs as a separate charge and has reserved the right to revise the unbundled local switching rates to recover costs associated with usage development and implementation." Then on Part 19, Section 3, sheet 31.1 section 5.12, there is a "Billing Development" charge which is identified as being new. The Billing Development charge applies per telecommunications carrier per switch, in the same manner as the prior ULS Usage Establishment Charge. Because it is charged on the same basis as the ULS Usage Establishment Charge, there is a concern that it covers the same costs as the former ULS Usage establishment charge.

Data Request B-3: Please explain whether the Billing Development charge covers the same costs as the former ULS Usage Establishment Charge. If it covers different costs, please explain those differences.

Ameritech's Response: Except for immaterial differences, Ameritech Wisconsin believes that the Billing Development Charge seeks to recover essentially the same costs as the ULS Usage Establishment Charge proposed in 1996 and 1997 and specifically addressed in the 1997 SGAT case. In its May 21, 2002 compliance filing, Ameritech Wisconsin sought to recover these costs as NRCs. Ameritech Wisconsin has since discovered that in the SGAT case, the Commission determined that these costs should be recovered, although not as NRCs but rather as part of the monthly recurring ULS charge. Assuming that this determination continues to reflect the Commission's views, Ameritech Wisconsin will revise its ULS recurring charge compliance filing to include these Billing Development costs.

Issue B-4: In Ameritech's May 21, 2002 cover letter, Ameritech states that the Broadband Services NRC, Broadband Services-DLE-Combined Voice and Data Loop NRC were unaffected by the Commission's Final Decision. However on page 185 the Final Decision states, "As the Commission is requiring Broadband service to be an end-to-end unbundling of Project Pronto an NRC consistent with a loop already in combination should apply to the Project Pronto end-to-end product as well."

Data Request B-4: Please explain where and how Ameritech implemented this requirement regarding the NRCs for the Broadband UNE. At a minimum why didn't Ameritech create a separate rate for migrations versus initial service installations?

Ameritech's Response: See response to Data Request B-2. The same is true of the facilities that comprise what the Commission has dubbed the end-to-end "Broadband UNE." For purposes of analyzing the type of NRC applied to it (i.e., "initial installation" versus "migration"), the "Broadband UNE" is most like a standalone unbundled loop. (It is not a "loop" because it includes electronics used to provision advanced services, which are expressly excluded from the FCC's definition of the "loop" that must be unbundled. See FCC Rule 319(a)(1).) The "Broadband UNE," like a loop, is a transmission path from a customer's premises to the central office; like a loop, the "Broadband UNE" does not provide an end-to-end service – it must first be combined with, or connected to, other facilities; and like a loop, provisioning a "Broadband UNE" requires physical work in the central office. Where a requesting carrier leases the "Broadband UNE," a cross-connect must be run from the OCD to the requesting carrier's collocation space, where it is connected to transmission/switching equipment which sends data transmissions on to an ISP (which packages DSL transport with information service to provide Internet access to the end user). The only time something like a "migration" could occur with respect to the "Broadband UNE" is the case where a requesting carrier is already subscribing to the wholesale Broadband Service. In that case, end-to-end service is already being provided to the end user, all of the necessary facilities are in place, and all of the requisite connections and combinations exist. In that case, it would arguably be appropriate to have a "migration" charge that would cover the cost of converting the existing combination used to provide the Broadband Service to service via the "Broadband UNE." No unaffiliated CLEC subscribes to the wholesale Broadband Service, however; and none has indicated any interest in doing so. Accordingly, the scenario under which something like a "migration" could occur simply cannot arise in Wisconsin. For that reason, there is no need for a separate "migration" rate in connection with the "Broadband UNE."

Issue B-5: Ameritech added travel to unmanned central office costs to the nonrecurring costs (NRCs) for the High Frequency Portion of the Loop (HFPL), the installation and disconnection of line splitters. While at page 121 the Commission determined "that it is reasonable to apply all of the adjustments it has approved for Ameritech's nonrecurring cost study to the calculation of the cost to install and remove cross-connect jumpers," the NRC cost study for line splitters formerly did not previously include any travel costs. In relation to travel costs, the Commission at page 181 accepted Ameritech's proposed travel costs.

Data Request B-5: Why did Ameritech add the travel costs to the cost of line splitter NRCs when Ameritech never proposed including travel costs in its original cost study? In adding travel costs why did Ameritech believe travel to unmanned centrals offices for line splitters would occur with the same frequency as travel to unmanned central offices for Digital UNE loops?

Ameritech's Response: Paragraph 2 on Page 181 of the Final Decision states "When a CO is unmanned, it results in travel costs for CO work being included in NRCs." Paragraph 3 on page 181 further states that "Accordingly, it is reasonable to use Ameritech's confidential percentage of unmanned COs in determining forward-looking NRCs."The Field Operations Group performs CO activity. As a result, every study that contains FOG workgroup effort was revised to include the time associated with traveling to an unmanned CO. The HFPL Cross-connect study is composed entirely of FOG workgroup activity. To be compliant with the Final Decision, travel time to unmanned COs was added to the HFPL Cross-connect NRC study at the confidential percentage proposed by Ameritech and agreed to by the Commission. Whether the travel is performed for a Line Splitter or Digital Loop, the percentage of unmanned Central Offices does not change. As a result, AIT uses the same travel to unmanned office percentage for any service that requires Field Operations Group (FOG) workgroup activity.

Issue B-6: Staff notices for almost all of the compliance NRCs that the sum of the TELRIC installation and disconnection costs is greater than former combined TELRIC costs.

Data Request B-6: Why do the NRC costs increase when they are broken into two components? Did Ameritech add travel costs to any other NRCs than the line splitters? Were any other additions made when dividing costs between installation and disconnection costs?

Ameritech's Response: The primary reason the NRCs increase when broken out into the install and disconnect components is because when breaking out the disconnect cost, the present value time value of money factor must be removed from the calculation (or set to a value of 1). This must be done because the disconnect will now be paid at the time of disconnect. Therefore, it is not necessary to discount the disconnect cost using the present value time value of money factor. Also, for those rate elements in which the FOG workgroup is required, travel to unmanned central offices has been included per the commission order (explained in Response B-5). There were no other adjustments made when separating the installation and disconnect costs. The NRC studies that incorporate the travel time to unmanned COs due to the FOG workgroup activity include:

Attachment K: Wi_une_3_6720-TI-161_COMP_Rev Sept 2002.xls (Line Connection NRC)
Attachment I: WI UNE NRC Digital Loop DS0 DS1 2001_COMP_Sept 2002.xls (DS0 & DS1 Loop NRC)
Attachment J: Wi_une_2_6720-TI-161_COMP_Sept 2002.xls (DS3 Loop NRC)
Attachment L: SubLoop_N_WhslUNE_WI_6720-TI-161-Compliance.xls (Subloop NRC) *
Attachment M: HFPL Cross-connects_N_WhslUNE_WI_00-02_COMP_Rev Sept 2002.xls (HFPL NRC)
Attachment N: Dark Fiber_N_WhlsUNE_WI_6720-TI-161_COMP.xls (Dark Fiber NRC) *
Attachment O: Wi_une_I_6720-TI-161_COMP_Sept 2002.xls (Unbundled Local Transport NRC)
Attachment P: RJF-3 - May 2002 compliance(rev1).xls(UNE-P Migration)

* Study not modified, original 5/21/02 study supplied as a point of reference.

Issue B-7: Ameritech calculates the cost for an initial installation and an additional installation in its new loop provisioning cost study. The most significant difference between initial installations and additional installations is travel costs. However, Ameritech only carries forward into the final rates, the initial installation rates and not the lower additional installation rates.

Data Request B-7: Assuming it is reasonable to create a new cost study for loop provisioning, why didn't Ameritech also include the lower additional installation rates in its proposed rates? Why didn't Ameritech incorporate this distinction in other NRC cost studies, such as line splitter installations, in which Ameritech added travel costs?

Ameritech's Response: Based on input from Staff and the interested parties, Ameritech decided to eliminate the new loop provisioning study and rerun the WI UNE NRC Digital Loop studies. Please refer to the following rerun studies.

Attachment I: WI UNE NRC Digital Loop DS0 DS1 2001_COMP_Sept 2002.xls
Attachment J:Wi_une_2_6720-TI-161_COMP_Sept 2002.xls

Issue B-8: Ameritech created new cost studies for transport provisioning in addition to the new cost studies for loop provisioning.

Data Request B-8: Please explain where in the Final Decision Ameritech believes that it was instructed to file new cost studies for transport provisioning.

Ameritech's Response: Based on input from Staff and the interested parties, Ameritech decided to eliminate the new transport provisioning study and rerun the WI UNE Local Transport NRC study. Please refer to the following rerun study.

Attachment O: Wi_une_l_6720-TI-161_COMP_Sept 2002.xls

Attachment A
Wisconsin UNE with order changes
A-1 A-2 A-3

Filed Confidentially

Attachment B
ACF summary sheet with
changes_09-06-02 with % change
FAO

Filed Confidentially

Attachment C
LatestACAR 03_22_02 with WI UNE figures_FAO

Filed Confidentially

Attachment D
LatestACAR 09_06_02 with WI UNE & ordered mtce factors_FAO

Filed Confidentially

Attachment E
LatestACAR 09_06_02 with WI UNE
& ordered mtce factors+dep
lives_FAO

Filed Confidentially

Attachment F
LatestACAR 09_06_02 with WI UNE & ordered mtce factors+dep lives+COC_FAO

Filed Confidentially

Attachment G
Digital Switching Maintenance calculations 09_06_02_FAO

Filed Confidentially

Attachment H

IDLC Conversion_R_Whsl_WI_02-05_COMP_Sept 2002.xls

Filed Confidentially

Attachment I

WI UNE NRC Digital Loop DS0 DS1 2001_COMP_Sept 2002.xls

Filed Confidentially

Attachment J
Wi_une_2_6720-TI-161_COMP_Sept 2002.xls

Filed Confidentially

Attachment K
Wi_une_3_6720-TI-161_COMP_Rev Sept 2002.xls (Line Connection NRC)

Filed Confidentially

Attachment L
SubLoop_N_WhslUNE_WI_6720-TI-161-Compliance.xls (Subloop NRC)

Filed Confidentially

Attachment M
HFPL Cross-connects_N_WhslUNE_WI_00-02_COMP_Rev Sept 2002.xls (HFPL NRC)

Filed Confidentially

Attachment N
Dark Fiber_N_WhlsUNE_WI_6720-TI-161_COMP.xls (Dark Fiber NRC)

Filed Confidentially

Attachment O
Wi_une_I_6720-TI-161_COMP_Sept 2002.xls (Unbundled Local Transport NRC)

Filed Confidentially

Attachment P
RJF-3 - May 2002
compliance(rev1).xls(UNE-P
Migration)

Filed Confidentially